

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In re: Dynamic Sports Performance, LLC:

	:	
	:	Case No. 20-12322-KHK
Debtor	:	Chapter 11
	:	

OPPOSITION TO MOTION TO DISMISS

Debtor, through undersigned counsel, responds to the Motion to Dismiss filed herein by the Office of the United States Trustee, as follows:

- 1. Debtor filed this Chapter 11, Subchapter V case on October 21, 2020.**
- 2. The bankruptcy petition was filed following a bank levy issued upon the company bank account by the Debtors' former landlord that froze all of the operating funds and client deposits held by the Debtor.**
- 3. Dynamic Sports Performance, LLC is a company that provides personal physical training services, both in person and online.**
- 4. The Debtor needs to be in bankruptcy so that it reorganize its Obligations, pay any debts over time and continue operations.**
- 5. On November 8, 2020 the Office of the United States filed a Motion to Dismiss.**

Nathan Fisher
Fisher-Sandler, LLC
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642
VSB #37161
Counsel for Debtor

6. The Debtor will be filing prior to December 15th a Chapter 11 plan that will propose to pay all creditors in full.

WHEREFORE, the Debtor respectfully requests that the Court Deny the Motion to Dismiss filed by the Office of the United States Trustee.

**Respectfully Submitted
Dynamic Sports Performance, LLC
By Counsel:**

**/s/ Nathan Fisher
Nathan Fisher
Fisher-Sandler, LLC
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642
VSB #37161**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of December 2020, I served the foregoing, via first-class mail, on the following, who are all necessary parties under Local Rule 4001(a)-1(E)(1):

**Jack Frankel, Esq.
Office of the US Trustee – Region 4
1725 Duke Street
Suite 650
Alexandria, VA 22314**

**Jolene Wee
JW Infinity Consulting, LLC
447 Broadway Street
2nd Floor, #502
New York, NY 10013**

Leon Koutsouftikis, Esq.
Magruder Cook Koutsouftikis & Palanzi
1889 Preston White Drive, Ste. 200
Reston, VA 20191

Darius Gilbert, Debtor Designee
6038 Richmond Highway, Apt. 612
Alexandria, VA 22303

s/s Nathan Fisher
Nathan Fisher